

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION

Dareus Stevons and TEC's Trucking, LLC, )

Plaintiffs, )

vs. )

Love's Travel Stops & Country Stores, Inc., )  
Love's Truck Solutions, LLC, and Love's )  
Solutions, LLC d/b/a Love's Travel Stops )  
and d/b/a Love's Tire Care, )

Defendants. )

Case No: 1:22-cv-3216-SAL

**NOTICE OF REMOVAL**

TO: CHRISTOPHER M. RAMSEY, ESQUIRE, COUNSEL TO PLAINTIFF:

Defendant Love's Travel Stops & Country Stores, Inc, the only proper party in interest and on behalf of itself and Defendants Love's Truck Solutions, LLC, and Love's Solutions, LLC d/b/a Love's Travel Stops and d/b/a Love's Tire Care, (collectively referred to as "Defendant Love's"), by and through its counsel Kelsey J. Brudvig and Kyle L. Brady of Collins and Lacy, P.C., files this Notice of Removal in the above-captioned case to the United States District Court for the District of South Carolina, Aiken Division, pursuant to, inter alia, 28 U.S.C. §§ 1332, 1441, and 1446.

Defendant Love's would respectfully show unto this Honorable Court:

1. The above-entitled action was brought in the Aiken County Court of Common Pleas by the Plaintiffs Dareus Stevons and TEC's Trucking, LLC ("Plaintiffs") to recover from Defendants a judgment for actual and punitive damages, together with the costs and fees of this action.
2. This action was commenced by the service of a Summons and Complaint against Defendants Love's Travel Stops & Country Stores, Inc., Love's Truck Solutions, LLC, and

Love's Solutions, LLC d/b/a Love's Travel Stops and d/b/a Love's Tire Care, service of which was made upon the Registered Agents for Defendants by certified mail on August 22, 2022.

3. Plaintiff Dareus Stevons alleges he is a citizen and resident of North Carolina.
4. Plaintiff TEC's Trucking, LLC alleges it is a North Carolina limited liability company with its principal place of business at 222 Southerland Street in Durham, North Carolina.
5. Defendant Love's Travel Stops & Country Stores, Inc. is a corporation incorporated in Oklahoma with its principal place of business being Oklahoma.
6. Defendant Love's Truck Solutions, LLC is an Oklahoma limited liability company with its principal place of business being Oklahoma .
7. Defendant Love's Solutions, LLC is an Oklahoma limited liability company with its principal place of business being Oklahoma .
8. Accordingly, complete diversity exists between the parties.
9. Plaintiffs' Complaint is silent as to the amount in controversy. Defendant Love's is informed Plaintiff Stevons is alleged to have suffered injuries purportedly as a result of a motor vehicle accident on or about May 22, 2019. Although the Complaint does not specify the amount of damages sustained or prays for a specific sum, Plaintiff Stevons alleges he has suffered and sustained injuries which required medical treatment and related expenses. He has sustained property damage to his truck and cargo. He has also been unable to work and has lost wages. As a result of these injuries, Plaintiff Stevons has sustained bodily injuries and incurred property damage. (Compl. at ¶ 36). Plaintiffs seek actual and punitive damages. (Compl. at ¶ 37). Additionally, undersigned counsel has spoken to Plaintiffs' counsel and Plaintiffs cannot stipulate to damages of less than the jurisdictional threshold.

Based upon this information, Defendant Love's submits there is sufficient evidence that the amount in controversy exceeds the jurisdictional threshold for removal.

10. Removal to this district and division is proper under 28 U.S.C. § 1441(a) because the district and division encompass the Aiken County Court of Common Pleas for the State of South Carolina, the jurisdiction in which the action was filed.
11. Defendant Love's files herewith copies of all process and pleadings served upon it in this action as part of this notice. **See Exhibit A.**
12. Defendant Love's will file a copy of this Notice of Removal with the Clerk of Court for Aiken County, South Carolina, and will serve a copy upon counsel for Plaintiff.

WHEREFORE, Defendant Love's prays this Honorable Court accept this Notice of Removal, take jurisdiction of the above-entitled case, and that all further proceedings in said case in the Court of Common Pleas, County of Aiken, State of South Carolina be stayed.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

COLLINS & LACY, P.C.

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ATTORNEYS FOR DEFENDANT  
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STORES, INC.

**NOTICE OF REMOVAL**

September 21, 2022  
Columbia, South Carolina